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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: CR. S 05-0076 MCE
)	
Plaintiff,)	STIPULATION AND ORDER TO EXTEND
)	TIME FOR HEARING AND EXCLUDE
vs.)	TIME
)	
LUIS ALBERTO RADILLO,)	
)	
Defendant.)	
)	
)	
)	

The parties agree that time beginning August 16, 2005 and extending through September 6, 2005, should be excluded from the calculation of time under the Speedy Trial Act. The parties submit that the ends of justice are served by the Court excluding such time, so that counsel for the defendant may have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and so that the defendant may have continuity of counsel. 18 USC 3161(h)(8)(B)(iv). In particular, counsel for defendant needs more time to prepare, and further discussions with the defendant are necessary. The parties stipulate and agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 19 USC 3161(h)(8)(A).

1 The parties further request that the matter be taken off the August 16, 2005 calendar and
2 be rescheduled to September 6, 2005, at 8:30 a.m.

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5 Respectfully Submitted


6 Dated this 15th day of August, 2005

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8 By: /s/ Danny D. Brace, Jr.
DANNY D. BRACE, JR.,

9
10 By: /s/ Samuel Wong
SAMUEL WONG

11 IT IS SO ORDERED:

12 DATED: August 22, 2005

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15 MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE